

REMARKS

Claims 1-32 are currently pending. Applicant has amended claims 1, 9, 18, and 28.

Applicant wishes to thank the Examiner for his consideration during the telephone interview on January 31, 2006. During the telephone interview, the Examiner and applicant's representative discussed the invention and the cited reference – Brunner and Koyanagi.

The Examiner has rejected claims 1-32 under 35 U.S.C. § 103(a) as being unpatentable based on the following combinations of references.

Claims	References
1-3, 6, 9-12, 16, 18-21, 25, and 28-32	Brunner and Koyanagi
4-5, 14-15, 23-24	Brunner, Koyanagi, and EO Target Geolocation Determination
8, 17, 26-27	Brunner, Koyanagi, and Williams
13	Brunner, Koyanagi, and Avila
22	Brunner, Koyanagi, and Abtikidis

Even though applicant respectfully disagrees with the rejections, applicant has amended independent claims 1, 9, 18, and 28 to further clarify the claimed invention. As agreed to by the Examiner during the January 31, 2006 telephone interview, claims 1-32 distinguish over the applied references for reciting features that are neither taught nor suggested by the cited references. For example, claim 1 recites "periodically setting an angular velocity ... that is calculated based on the velocity of the vehicle and the current position of the vehicle relative to the current position of the target," which is neither taught nor suggested by the cited references. Moreover, as applicant discussed in the Office Action response filed on October 13, 2005, none of the cited references provides any suggestion or motivation for combining the teachings of the cited references. Accordingly,

claims 1-32 recite a novel combination of elements that is neither taught nor suggested by the cited references.

Based upon the above amendments and remarks, Applicant respectfully requests reconsideration of this application and its early allowance. If the Examiner has any question or believes that a telephone conference would expedite the prosecution of this application, the Examiner is encouraged to call the undersigned at (206) 359-8548.

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Respectfully submitted,

By 

Chen Liang

Registration No.: 51,945

PERKINS COIE LLP

P.O. Box 1247

Seattle, Washington 98111-1247

(206) 359-8000

(206) 359-7198 (Fax)

Attorney for Applicant